

ROADMAP	
TITLE OF THE INITIATIVE	Web accessibility Action Plan
TYPE OF INITIATIVE	<input checked="" type="checkbox"/> CWP <input type="checkbox"/> Non-CWP <input type="checkbox"/> Implementing act/Delegated act
LEAD DG – RESPONSIBLE UNIT	INFSO H3
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This indicative roadmap is provided for information purposes only and is subject to change. It does not prejudice the final decision of the Commission on whether this initiative will be pursued or on its final content and structure.

A. Context, problem definition
<p>(i) What is the political context of the initiative? (ii) How does it relate to past and possible future initiatives, and to other EU policies? (iii) What ex-post analysis of the existing policy has been carried out and what results are relevant for this initiative?</p>
<p><i>(i) What is the political context of the initiative?</i></p> <p>Use of the Internet has become a significant element in the daily life of citizens, and institutions increasingly rely on it for serving and interacting with its citizens due to the extended reach and efficiencies. For 'reaching' every citizen, a success factor depends, among other things, on the ease of use of the enabling Information and Communication Technologies (ICT). Specific to the Internet, web-accessibility refers to principles and software techniques for making web contents accessible, in particular for people with disabilities and age-related loss of abilities. Above all, accessibility features often contribute to more usability for all users.</p> <p>The population with functional limitations is significant; thus, public institutions, as a source of essential information and services to its citizens, are under increasing pressure to observe accessibility requirements. In this respect, a significant number of Member States have already either enacted legislation or other measures regulating and promoting such implementation in public websites.</p> <p>Relevant suppliers in the website domain ('web-developers') should be enticed into and benefit from the growing market of Web accessibility as well – for creating accessible Websites, there are international guidelines. Nevertheless, surveys reveal major differences across the EU in rules and practices linked to Web Accessibility, and these differences are reflected in the technical provisions of contracts and procurements.</p> <p>Thus, Web accessibility is a matter of observing equal rights for citizens; hence, it is part of the overall EC commitment towards people with disability and is covered by several Articles of the proposal for an Equal Treatment directive currently before the Council. Nevertheless, it is also a matter of internal market, because different national treatments of the theme (policies, laws, standards) raise entry barriers for web-developers to operate cross-border. For a small enterprise, the cost burdens posed by the fragmentation might even be prohibitive.</p> <p>Thus, an EU-action is needed to ensure the availability throughout the EU of quality web development related services through effective competition. For the institutions themselves (the contractors or website owners), collaborations on relevant policies and more service-offers would reduce costs; and harmonised treatments would be conducive to the development of cross-border services such as those promoted by the eGovernment Action Plan from the European Commission. Above all, European citizens would benefit from an increased availability of more usable and convenient on-line services.</p> <p><i>(ii) How does this initiative relate to past and possible future initiatives, and to other EU policies?</i></p> <p>In relation to the <u>availability of accessible websites</u>, since the early 2000s, governments have made many political pledges to improve web-accessibility of their websites.</p> <p>In two Resolutions (i) “eEurope Action Plan 2002: accessibility of public websites and their content”¹ and (ii) “eAccessibility – improving the access of people with disabilities to the knowledge based society”², the Council stressed the need to speed up accessibility to the Web and its content.</p>

In 2002, the European Parliament suggested that all public websites be fully accessible to disabled persons by 2003².

Two Commission Communications – “eAccessibility”(2005)⁴ and “Towards an accessible information society”(2008)⁵ – promoted EU e-Accessibility initiatives.

e-Accessibility refers to the accessibility of ICT in general, such as mobile phones and self-service terminals (e.g. ATM), including the Web.

The Riga Ministerial Declaration on an inclusive Information Society⁶ committed Member States to promote and ensure accessibility of all public web sites by 2010.

In 2009, Council Conclusions on accessible information society⁷, supporting the 2008 Commission Communication, stressed the need for further progress on web-accessibility. It proposed to the Member States to follow a common approach expressed in a possible Recommendation on web-accessibility.

Within the Europe 2020 Strategy⁸, the Digital Agenda for Europe (DAE)⁹ announced: "The Commission will, based on a review of options, make proposals by 2011 that will make sure that public sector websites (and websites providing basic services to citizens) are fully accessible by 2015".

The eGovernment Action Plan 2011-2015¹⁰ sets as aims by 2015:

a number of "key cross-border services will be available on line, [...] allowing citizens to study, work, reside and retire anywhere in the EU;
50% of EU citizens will have used eGovernment services".

The Commission has recently evaluated the accessibility of a selection of its own websites, and updated the "Information Providers Guide"¹¹ to comply with the international guidelines on Web accessibility. In addition, its eGovernment Action Plan 2011-2015¹² calls for the development of services designed around user needs and ensuring inclusiveness and accessibility.

The Disability Strategy¹³ adopted in 2010 by the Commission has announced that it would consider proposing a 'European Accessibility Act' by end of 2012. This could refer to a Web accessibility action plan when addressing accessibility of websites in relation to services.

Some existing EU legislations already pledge for accessibility, but they do not provide for harmonised conditions for the internal market and a fully accessible environment.

Public Procurement Directive (2004/18/EC)¹⁴: establishes that "Whenever possible the technical specifications should be defined so as to take into account accessibility criteria for people with disabilities".

AudioVisual Media Services Directive¹⁵: 'Encourage' media service providers to make audiovisual content increasingly accessible.

² 2003/C 39/03

³ C5-0074/2002-2002/2032(COS)

⁴ COM(2005)425

⁵ COM(2008) 804

⁶ http://ec.europa.eu/information_society/events/ict_riga_2006/doc/declaration_riga.pdf

⁷ COM(2009) 804

⁸ COM(2010) 2020, http://ec.europa.eu/eu2020/index_en.htm

⁹ http://ec.europa.eu/information_society/digital-agenda/index_en.htm

¹⁰ http://ec.europa.eu/information_society/activities/egovernment/action_plan_2011_2015/index_en

¹¹ http://ec.europa.eu/ipg/standards/accessibility/index_en.htm

¹² http://ec.europa.eu/information_society/activities/egovernment/action_plan_2011_2015/index_en.htm

¹³ <http://ec.europa.eu/social/BlobServlet?docId=6284&langId=en>, 15/11/2011

¹⁴ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:134:0114:0240:EN:PDF>

¹⁵ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:095:0001:0024:EN:PDF>

¹⁶ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2000:178:0001:0016:EN:PDF>

¹⁷ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:337:0037:0069:EN:PDF>

¹⁸ [http://ec.europa.eu/regional_policy/sources/docoffic/official/regulation/pdf/2007/general/ce_1083\(2006\)_en.pdf](http://ec.europa.eu/regional_policy/sources/docoffic/official/regulation/pdf/2007/general/ce_1083(2006)_en.pdf)

¹⁹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32000L0078:en:HTML>

²⁰ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32002L0022:EN:NOT>

²¹ <http://www.epractice.eu/index.php?page=search&q=einclusion>

²² United States Access Board, <http://www.access-board.gov/news/ict-draft-rule.htm>, 03/2010

²³ <http://www.un.org/disabilities/default.asp?id=150>

²⁴ http://ec.europa.eu/enterprise/standards_policy/mandates/database/index.cfm?fuseaction=search.detail&id=333

²⁵ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0015:FIN:EN:PDF>

²⁶ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2008:0426:FIN:EN:PDF>

Electronic Commerce Directive¹⁶: establishes that associations representing the disabled should be consulted to take account of their specific needs in the drafting and implementation of codes of conduct.

The Directive 2009/140/EC amending the Directive on the authorisation of electronic communications networks and services, 2002/20/EC¹⁷, whose referred consumer protection rules include conditions on accessibility for users with disabilities

Structural Fund Regulations¹⁸: Accessibility as criteria for granting co-financing

Employment Directive¹⁹: Equality in the access to employment (e.g. application to on-line offers)

Universal Service Directive²⁰: Special measures for disabled users to undertakings, who provide publicly available electronic communications networks and services.

EU funding programmes (e.g., FP RTD, CIP-ICT PSP, AAL) support R&D and stimulate innovation on web-accessibility. Other means such as studies and platforms (e.g. e-Practice²¹) support the monitoring of web-accessibility progress and implementation in the Member States, as well as the exchange of good practices.

At country level, several Member States have taken action on web-accessibility; however, progress is varied. Differences persist and new ones emerge in terms of the technical specifications, as well as focus, for example, anti-discrimination in relation to the Information Society.

In the USA, web-accessibility is mandatory for public procurement of federal web sites since 1998 (Section 508 of the Rehabilitation Act); and the reference specifications are being updated²² to take into account new technologies and web specifications. The US Department of Justice is currently consulting about mandating web-accessibility for certain commercial websites, further to various court cases.

At the international level, the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)²³ is providing new momentum for acting on e-accessibility. It is a legally binding Treaty, concluded by the EU and several Member States. It calls for measures to ensure an equal basis in the access to ICT-based systems and services.

In relation to the harmonisation of market conditions, the following action is significant.

The Commission issued to the European Standardisation Organisations a Mandate (M/376)²⁴ to develop a European standard providing the functional accessibility requirements of ICT products and service that could be used in procurements.

(iii) What ex-post analysis of the existing policy has been carried out and what results are relevant for this initiative?

The Public Procurement Directive is undergoing a revision process and reform will look into the issue of using public procurement to pursue social goals – vide Commission's Green Paper on the modernisation of EU public procurement policy²⁵, from Jan 2011.

With positive prospects, it might contribute as lever on the up taking of Web accessibility. However, a certain degree of harmonisation would be achieved only if a common reference standard shall be established. Furthermore, effects would be only on procured websites (not on those developed internally).

The Universal Service Directive has been revised in 2009, but Web-accessibility remains not covered.

The proposal COM(2008)426²⁶ for a Council Directive on implementing the principle of equal treatment between persons irrespective of religion or belief, disability, age or sexual orientation proposes non-discriminatory access to the services that are available to the public. Even after adoption, an anti-discrimination approach could still sustain or lead to a fragmented market as it would focus on addressing discrimination of individuals and could not encompass harmonised solutions. Consequently, the risk is that the Digital Single Market will not become a barrier-free market for all.

What are the main problems which this initiative will address?

Fragmentation of the Digital Internal Market

The main persistent problem is the **fragmentation** of approaches to web-accessibility among the Member States, which includes the use of different functional specifications. Eleven Member States have direct legislation; eleven have other measures; and five have no clear measures. Where there is legislation, this refers in different ways to WCAG 1.0 as well as variations of it, and leaves room for interpretation. More recent national legislations (or proposals for one) refer to WCAG 2.0 or variations of it. The scope of the legislation in terms of type of websites concerned and timing also varies. Most legislation is weakly enforceable, and compliance levels are highly variable.

For Web developers, such divergences mean several different market and regulatory conditions to master, operate on, and follow changes; hence, a significant discouraging barrier for venturing business across the EU.

A root driver for this problem is **uncertainty** by the service contractors. This uncertainty in turn is related to their (lack of) capability to implement web-accessibility and knowledge of costs and benefits. The strength of the voice of end-users and industry, as well the level of cooperation among public authorities to address common approaches and priorities in this field, play also a role. The lack of common specifications is a clear sign of uncertainty, and indirectly, by increasing fragmentation, it increases further uncertainty.

Who will be affected by it?

1. Business entities offering IT services to the public authorities for remuneration. These need to:

N.1 reduce costs in handling web-accessibility in the home market

N.2 not have the burden to observe different national rules related to web-accessibility in order remain competitive when acting across borders and not experience barriers to trade

N.3 get access in a cost-effective way to a wider European market of potential customers, by making their websites accessible across Europe.

2. Public administrations in the EU. These need to:

N.4 increase efficiency, reduce public expenditures and increase effectiveness in realising web-accessibility

N.5 deliver upon their political commitments and social responsibility and improve their reputation in dealing with disabled people

N.6 realise commitments such as those from the Riga Declaration, i2010 initiative, the DAE ("make sure that public sector websites are fully accessible by 2015") and the UNCRPD

N.7 keep up with evolving technologies and standards.

3. Citizens in particular those with disabilities. These need to:

N.8 obtain barrier-free access to online information and services for enjoying all the available facilities (e.g. e-government, education, etc.).

(i) Is EU action justified on grounds of subsidiarity?

(ii) Why can Member States not achieve the objectives of the proposed action sufficiently by themselves? (Necessity Test)

(iii) Can the EU achieve the objectives better? (Test of EU Value Added)

Pursuant Article 114.1 of Treaty on the Functioning of the European Union (TFEU), the EU "shall adopt the measures for the approximation of the provisions laid down by law, regulation or administrative action in Member States which have as their object the establishment and functioning of the internal market." Harmonisation of the rules and practices in the Member States relating to the accessibility of websites contributes to the achievement of these objectives.

Necessity Test and Test of EU Value Added

trans-national coordinated cooperation such as for the adoption and implementation of harmonized specifications, and comparability of progress would not be achieved if action remains at national level only

lack of national measures or differences in the ones being taken mean that citizens and economic operators are subject to barriers while trying to move or operate cross-border, significantly damaging the interests of the Member States.

More efficiency in the use of resources would be achieved by jointly adhering to common specifications (lower cost for implementation) and by participating in a European cooperation scheme to share knowhow and good practices, and for any updating that will regularly be required to follow the technologies, standards, and the use of technologies

Positive feedback loops at European level such as joint comparison of progress involving all stakeholders would increase effectiveness in removing fragmentation and implementing web-accessibility, with the growth of the market acting as an accelerator. Moreover, the wider a reference standard is adopted, the higher is the competitiveness of complying services and products

An action at EU-level would address the main problem in a more efficient, effective and coherent way, reducing the duplication and inadequacy of national efforts and the fragmentation of the internal market.

B. Objectives of the initiative

What are the main policy objectives?

Based on the problem, drivers, and needs previously identified, the following objectives (expected effects or impacts) can be set. The relevance of the general objectives to the identified needs are indicated.

Rlv. to:

General objectives:

- | | |
|---|--------------------|
| I. Reduce fragmentation in national approaches on web-accessibility, by defining the role of specific functional specification or EU harmonised standard in considering websites accessible | N.2 N.3
N.4 N.7 |
| II. Increase web-accessibility of public-administration websites and relevant basic online services | N.1 N.2
N.5 N.6 |
| III. Support commitments relating to web-accessibility laid down in the Digital Agenda, UNCRPD, and further related policy initiatives | N.6 N.8 |

Specific objectives:

- IV. Establishment of target date for realising web-accessibility
- V. Definition of types of websites concerned, with a minimum common list
- VI. Promote capacity building and changes in the Web-site development process to sustain a behavioural change towards 'web-accessibility'

Operational objectives:

- VII. Establish a scheme for monitoring and reporting at EU level; and of collaboration
- VIII. Achievement of full web-accessibility websites of the public administration that are present in the common list and were newly created after the adoption of this intervention
- IX. Achievement by 2015 of web-accessibility of websites that are present in the common list and already existed before the adoption of this intervention
- X. Establishment of national lists of types of relevant websites (those that are to be accessible)
- XI. Comparable annual reporting of accessibility of websites

Do the objectives imply developing EU policy in new areas?

No

C. Options

- (i) What are the policy options being considered?
- (ii) What legislative or 'soft law' instruments could be considered?
- (iii) How do the options respect the proportionality principle?

(I, II) Policy options and instruments being considered

Policy Option 1: Proceed with *status quo*, no change in policy. The EU continues (i) to provide political drive and dissemination through communications, events, thematic networks or platforms; and (ii) benchmarking, monitoring, dialogues with Member States and other stakeholders, and gathering evidences through studies. It maintains its standardisation mandate towards Web accessibility, and continues to implement Web accessibility in its relevant Web sites. It carries on supporting R&D on web-accessibility through its funding programmes.

The subsequent policy options 2, 3, and 4 are all in complement to policy option 1.

Policy Option 2: The adoption of a Recommendation (soft law) as suggested in the Council Conclusions on COM(2009)804. The Recommendation would serve to promote the engagement and alignment of initiatives in the Member States for building awareness, expertise, infrastructures, and adoption of common technical specifications or standards, and monitoring methodologies. As the aimed 'common technical specification', it would include a reference to WCAG 2.0, conformance level AA, and also mention the prospect of this being updated when the European standard (outcome of mandate M/376) becomes available.

Policy Option 3: The Commission proposes a legally binding measure – Directive – to ensure approximation of the national provisions on web-accessibility in order to avoid fragmentation in the internal market and to ensure a coherent level of implementation of web-accessibility.

The measure will:

define a 'harmonised level of web-accessibility' – as one that is equivalent to the accessibility achieved by implementing specifications as referred to in the legislation (namely, WCAG 2.0 level AA or the EU harmonised standard when available);

establish a minimum list of types of websites concerned – as the referred 'basic public services' for eGovernment benchmarking.

For the Member States, this legally binding measure would require:

the establishment and adoption of necessary measures to implement and monitor the 'harmonised level of web-accessibility' in the public administration websites that provide essential information and services to citizens²⁷;

the definition and publication of types of websites concerned (i.e. those that they commit to render accessible beyond the minimum list and those they consider to be included); the possibility to establish an exclusion list of websites or types of websites that do not need to make accessible, for reasons of undue burden.

to render accessible immediately the newly built concerned websites and, by 2015, already existing relevant websites.

the periodical assessment of accessibility of the relevant websites and the collection and assessment of users' complaints at national level, and the communication of the result of the assessment to the European Commission;

the choice of the most appropriate means of dealing with user complaints, which should, however, include accessible online complaints reporting;

the participation in EU-wide cooperation and dialogue with stakeholders, in particular industry and civil society (people with disabilities, elderly, and their organisations) for joint input to the monitoring of compliance with the measure;

the involvement of these stakeholders in awareness raising, user requirements gathering, information and guidance provision, handling of complaints, monitoring, and reporting;

taking measures to encourage website owners providing basic services to citizens or consumers²⁸ to implement web accessibility.

In parallel, the EU will take actions to establish a governance framework to enable a coherent implementation.

The purposes would include *inter alia*:

the use of harmonised methodologies for declaring and evaluating accessibility;

common responses to evolution of technologies and standards;

collection of statistics on compliance and shared best-practices;

compliance with related policy actions (e.g. UNCRPD);

involvement of civil society, industry, and public authorities in common EU-level monitoring.

Looking to the future, by means of Delegated Act, the Commission

would substitute the reference standard on Web accessibility by the European standard (as soon this is available);

could modify requirements in terms of conformance levels in order to take into account developments in Web technologies;

could reach decisions regarding the 're-engineering' of non-accessible Web sites that existed before this intervention, contributing as well to a greater harmonisation among the Member States.

²⁷ As far as public websites are concerned a minimum list would be included in the measure based on the list of 20 "basic public services" that have been adopted in 2001 by the Commission (in cooperation with the Member States) for eGovernment benchmarking (since then, performed every few years). Of these 20, there are 12 citizen-oriented services including tax declaration, birth and marriage certificates, and enrolment in higher education

²⁸ Types of websites providing basic services to citizens can be defined as those providing citizens with services of general economic interest, possibly with listed exceptions and extensions

Policy Option 4: The Commission proposes a legally binding measure – a Council Regulation – based on equal rights (Art. 19.1 TFEU), requiring that all relevant public sector websites to be accessible, with a view to putting in effect in Member States equal treatment for online participation and combat indirect discrimination on the grounds of disability or age.

The measure will:

define the 'principle of web-accessibility';

define a minimum list of types of websites concerned – as the referred 'basic public services' for eGovernment benchmarking.

For the Member States, this legally binding measure would require:

the establishment and adoption of necessary measures to implement and monitor a minimum level of web-accessibility in the public administration websites that provide essential information and services to citizens

the further provisions as for Option 3.

(iii) How do the options respect the proportionality principle?

In Option 3 and 4, Proportionality is addressed by the flexibility in terms of scope (websites concerned) and other implementation parameters (measurement, monitoring, complaints handling).

D. Initial assessment of impacts

What are the benefits and costs of each of the policy options?

* Accounts on the necessary inputs (main cost categories)

	Option	1	2	3	4
Cost: training, authoring and evaluation tools (if not available)		+	+	+	+
Cost: keeping websites accessible		0	+	+	+
Cost: Administrative burden due to information obligations		0	0	++	+

('0' means no additional cost to what is already being done, and '++' indicates higher cost than '+')

* **Economic impacts :**

Option 1

Web-developers would continue facing a smaller market and difficulties to operate cross-border due to higher costs to adapt bids to national specificities.

Website owner (public authorities) would lose opportunities for not sharing approaches; and given continued fragmentation, Member States would not benefit from economies of scale in the supply of web-accessibility, and continue to experience supplier lock-in, and face continued higher costs to realise web-accessibility.

Option 2

Web-developers are likely to face still a fragmented internal market with disadvantages as in Option 1. In Member States that already have followed WCAG 1.0, there would be cost savings as cost of WCAG 2.0 are lower than of WCAG 1.0. Otherwise, there is little change in the impact compared to the *status quo*.

Option 3

Web developers would benefit from being able to operate across Europe more easily and at lower costs; thanks to harmonised specifications and a larger market (as more websites need to be made accessible).

Public authorities would have reduced website-building costs due to competition, and savings due to coordinated actions and decisions on Web accessibility.

Option 4

Web developers would benefit from an increasing demand for accessibility-related services, and so, a certain economy of scale.

Public authorities would have reduced website-building costs.

*** Political impacts :**

Option 1 and 2

With ever more government services moving online and the persistent strain on public budgets, pressure will increase to switch off paper and counter-based public service provision. Without countermeasures, digital exclusion is likely to increase, with a risk of political reputation damage. Litigation based on existing anti-discrimination legislation will likely increase. Pursuing the status quo will not deliver the common national (cf Riga) and EU-level (DAE) political objectives.

Option 3

Where governments have introduced strong web-accessibility rules, they have seen a significant increase in the usage of the web portals and have been recognised by winning awards. Governments would avoid litigation and complaints. The EU would be recognised for contributing to a true Digital Single Market.

Option 4

As in Option 3, this approach would lend credibility to governments showing consistency between their political and legal commitments related to disabled people and their actual behaviour.

*** Social impacts :**

Option 1

Continued 'digital exclusion' - reduced access to job opportunities by persons with disabilities.

Option 2

Limited impact in relation to the status quo for countries that do not have national legislation, as web-accessibility is not likely to improve much. For countries with legislation, some improvement is likely as the more recent specifications (version 2.0 of WCAG) offer better link to new web technologies.

Web-developers are likely to face still a fragmented internal market with disadvantages as in Option 1. In Member States that already have followed WCAG 1.0, there would be cost savings as cost of WCAG 2.0 are lower than of WCAG 1.0.

Option 3 and 4

Significant increased web-accessibility and, thereby, increased opportunities for economic and social participation for people with disabilities.

Could any or all of the options have significant impacts on (i) simplification, (ii) administrative burden and (iii) on relations with other countries, (iv) implementation arrangements? And (v) could any be difficult to transpose for certain Member States?

In terms of Administrative burden, policy options 3 and 4 entail information obligations for national authorities; such information would serve to monitor the indicators at EU level and to extract and disseminate experiences. Examples to be closely examined are: Notification of complaints, Co-operation with audits, Submission of reports, and First of Third-party certification of Web-pages.

(v) Could any or all of the options be difficult to transpose for certain Member States?

Under **Option 3**, the Member States would have time and flexibility to transpose the legislative act. Due to the fact that national legal provisions differ in the Member States (as shown the results of the study MeAC), transposition delays of 2 to 4 years should be considered.

(i) Will an IA be carried out for this initiative and/or possible follow-up initiatives? (ii) When will the IA work start? (iii) When will you set up the IA Steering Group and how often will it meet? (iv) What DGs will be invited?

An Impact Assessment Steering Group (IASG) led by DG INFSO was established in April 2010 with services and departments of the Commission including Secretariat-General; Legal Service; the Directorate-Generals: COMM, DIGIT, ECFIN, EMPL, ENTR, ESTAT, JUST, MARKT, and SANCO. Meetings were held on 15th April, 24th Sep 2010, and 26th Jan 2011.

(i) Is any of options likely to have impacts on the EU budget above €5m?

(ii) If so, will this IA serve also as an ex-ante evaluation, as required by the Financial regulation? If not, provide information about the timing of the ex-ante evaluation.

NA

E. Evidence base, planning of further work and consultation

- (i) What information and data are already available? Will existing impact assessment and evaluation work be used?
- (ii) What further information needs to be gathered, how will this be done (*e.g. internally or by an external contractor*), and by when?
- (iii) What is the timing for the procurement process & the contract for any external contracts that you are planning (*e.g. for analytical studies, information gathering, etc.*)?
- (iv) Is any particular communication or information activity foreseen? If so, what, and by when?

(i) *What information and data are already available?*

- * Two benchmarking studies, which provided data on the status and progress of eAccessibility in Europe,
- * A major consultation - "Economic Assessment for Improving e-Accessibility Services and Products" - to experts and stakeholders at European level. It has provided the various costs and benefits when implementing Web-accessibility, within different scope of the stakeholders.
- * Consultation to the i2010 e-inclusion subgroup composed of representatives of Member States, EEA, and associated States with a leadership role in e-Inclusion. Member States voiced positions and recommendations on implementation and need for common guidelines

Which stakeholders & experts have been or will be consulted, how, and at what stage?

See previous item; in addition, DG INFSO supports a Web portal – e-practice – for discussions among several communities in the domains of e-Inclusion, e-Government, and e-Health. Within the former, the community on "eAccessibility practice, policy, monitoring and impact" actively promote the exchange of knowledge and experiences on eAccessibility. This portal will continue to promote such exchange and serve as a source of significant information on developments.